

(received via email)

**From:** Randy Burleson  
**To:** "Sue McConnell" <smcconnell@waterboards.ca.gov>  
**Date:** 4/1/2009 5:30 AM  
**Subject:** Rubicon Traffic Study Omissions and Errors  
**Attachments:** ole2.bmp; AppendixD.PDF; Rubicon Count Data

I'm not sure how sections of the County's aborted Rubicon Trail Master Plan (RTMP) wound up in the Administrative Record, but it is important to note that this document was withdrawn and not certified by El Dorado County - the very agency that was responsible for initiating and funding it. That's a clear statement on the County's lack of faith in this plan, and implicit commentary on the undue influence afforded to the anti-OHV activists bent on creating an impractical, unenforceable RTMP.

To be clear, the entire RTMP is not certified, it was only released as a DRAFT document. Public feedback was never completed - comments of experienced trail users and related experts were ignored and set aside, and the document has never had the benefit of a full draft, review, and revision cycle. It is neither fully released as an approved, agency document, nor is it even peer-reviewed or published as an academic study. As such, it is completely inappropriate to cite any section of the RTMP.

Certain elements of the Master Plan are worth commenting further, even in their diminished state as elements of an uncertified, unreviewed, unreleased assembly of opinions. The Traffic Report is one such element, and I am providing specific comment to this section, since I worked closely with the County Department of Airport, Parks, and Grounds; their contractor, Environmental Stewardship and Planning (ESP); and their Contractor kdAnderson Transportation Engineers. While I appreciate their efforts, the actual Traffic Report that resulted is vague, at best, and occasionally incorrect, as detailed below. I do agree with their general wrap-up conclusion, which states "Additional monitoring of both traffic volumes and travel through constrained locations is needed in order to suggest the level of use (t)hat contributes to these problems," but other elements of this Traffic Report need work.

<<AppendixD.PDF>>

Indirect Studies

Other than the FOTR survey, the roads surveyed were too far from the trail to provide direct correlations to traffic on the Rubicon. The Traffic Report even makes note of this, saying, "Daily traffic volume counts were conducted by hour at key locations on the routes providing access to the Trail during the summer of 2005." The problem is that the Rubicon trailhead areas are heavily used to provide access to many different types of recreationists, not just Rubicon Trail users, and this mixed usage significantly overlaps the entrances to the Rubicon Trail (non-motorized users visit Loon Lake, Bugle Lake, Miller Lakes, etc.). Placing rubber hose counters at the paved roads that access both non-motorized and motorized resources yields mixed results at best, with insufficient specificity and minimal ability to draw conclusions on use patterns, beyond the most general Crystal Basin recreational usage.

FOTR's Involvement

The FOTR survey was no mere "origin-destination survey," as characterized in the Traffic Report, though it did have that component built into it. FOTR volunteers worked the trail at chokepoints and counted and interviewed every trail user, motorized or not. Counting was the primary purpose, but we also surveyed for direction of travel, destination, quality of experience, and etc. A subset of the data is provided below - FOTR provided this information to kdAnderson and ESP, as well as infra-red counter data and trail surveys that were do not appear in the Traffic Report.

<<Rubicon Count Data>>

Under-Reported Parking Capacity

This Traffic Report significantly under-reports trailhead capacity. Careful parking and cooperative users regularly park 2-3 times the number of vehicles that the Traffic Report suggests as a limit.

#### Omitted History: Loon Lake

This Traffic Report also omits significant chunks of key history and description of the Ellis Creek OHV Trail and the County Road to it. This aggregate route is indeed "an alternative trail that links the Loon Lake staging area with the main portion of the Trail near the Ellis Creek crossing," but its history stretches far beyond the 1989 Forest Order that set aside the areas on either side of the County Road / OHV trail as a Non-Motorized Winter Recreation Area (36 CFR 261.56). This road's very presence provided the access to develop the hydropower plant at Loon Lake, the Loon Lake Chalet / warming station (1998), and the Winter Recreation Area (1989) - these resources would not exist today without the County Road connecting and crossing the dams!

Though the County Road is left unplowed past the SMUD Powerhouse in the winter, it saw regular use through 2003, when motorized recreation entered into a trial one-year voluntary detour agreement to divert winter OHV use from Loon Lake to Wentworth Springs. SMUD plowing still stops at the Loon Lake Chalet, but the County Road continues for more than a mile further, past both dams and down to the base of the dam, where gravel turns to native surface, and continues across the granite to connect with the Rubicon Trail near Ellis Creek. This snow-covered road across both dams has recently been co-opted for muscle-powered use as the Polaris Trail, but motorized access to this area stretches back past the short-term voluntary use agreement, past the creation of the Non-Motorized Winter Recreation Area, indeed, past the SMUD facility at Loon Lake, even past when Pleasant Lake was joined to Loon Lake in 1963 by construction of the Rubicon Dam, Auxiliary Dam, and Reservoir ([http://hydrorelicensing.smud.org/docs/iip/iip\\_c.pdf](http://hydrorelicensing.smud.org/docs/iip/iip_c.pdf)), and even before SMUD started planning the UARP in 1948 ([http://hydrorelicensing.smud.org/project/proj\\_his.htm](http://hydrorelicensing.smud.org/project/proj_his.htm)). The old routing of the road that pre-dated the big dam over Gerle Creek is visible to this day on the ground just North of the dam, and is shown clearly on the 1931 USFS map of the Eldorado National Forest (<http://www.gerlecreek.com/documents/eldoradonf1931map.jpg>).

Though the muscle-powered recreationists have only been using the Road for a few short decades, they continue to create conflict with the traditional users and their motorized equipment. The skiers and snowshoers have no formal approval to use the road, but they are posting illegal closure signs and intimidating traditional motorized users. The snow-play folks can't seem to share, and they leave a legacy of broken promises, lack of leadership, and poor behavior that has been witnessed by many local organizations and agencies.

#### Omitted History: Access via McKinstry Lake

Also omitted is the historic access to the Bugle Lake and the Rubicon Trail at Ellis Creek via Forest Road 14N05/14N34B from McKinstry Lake. Study of any number of Forest Service maps clearly shows access to the Rubicon Trail from the north, descending along the west side of Ellis Creek.

I certify under penalty of perjury under the laws of the State of California that the foregoing information is true and correct.

Randii

Randy Burleson

frequent user and volunteer in the Friends of the Rubicon (FOTR) and Friends of the Eldorado National Forest (FOEnf)  
member of Sierra Treasure Hunters Club, California Association of Four Wheel Drive Clubs, Blue Ribbon Coalition

<<Paintbrush Picture>>